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**Selendy  
& Gay**

September 3, 2021

**Via ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** September 6, 2021

**Re: *Malloy v. Pompeo*, No. 18 Civ. 4756 (PGG) (KNF)**  
***Malloy v. U.S. Dep't of State*, No. 19 Civ. 6533 (PGG) (KNF)**

Dear Judge Gardephe:

We write as limited pro bono counsel to Plaintiff Jane Malloy in the above-referenced cases. We write to respectfully request that the Court enter an order permitting the sealed filing of Plaintiff's September 3, 2021 letter in response to Defendants' August 31, 2021 letter-motion (Case No. 19 Civ. 6533, ECF No. 86) for a pre-motion conference regarding Plaintiff's subpoena to depose Harry Ting on September 1, 2021.

The Court granted Defendants' August 31, 2021 application for their unredacted pre-motion letter to be filed under seal and accessible only by counsel. Case No. 18 Civ. 4756, ECF No. 88; Case No. 19 Civ. 6533, ECF No. 88. We respectfully request that our responsive letter be afforded the same treatment. If permitted to file our response under seal, we will file a redacted version of our responsive letter on the public docket.

Respectfully submitted,

s/ Michael Duke  
Michael Duke

s/ Babak Ghafarzade  
Babak Ghafarzade

Cc: All Counsel (by ECF)  
Jane Malloy (by ECF)